



**Planned Parenthood of Illinois Comments on  
“The Path to Transformation: Concept Paper for an 1115 Waiver for Illinois Medicaid”  
November 25, 2013**

Planned Parenthood of Illinois (PPIL) appreciates the opportunity to comment on “The Path to Transformation: Concept Paper for an 1115 Waiver for Illinois Medicaid”. PPIL applauds the State of Illinois for exploring ways to transform Medicaid in order to create a more integrated and efficient system that will result in better outcomes for clients.

PPIL provides reproductive health care to approximately 60,000 patients each year at 17 health centers throughout Illinois. Forty-three percent of our health care visits are for patients enrolled in Medicaid or the Illinois Healthy Women Program. IHW provides Medicaid coverage limited family planning services for adult women whose income is at or below 200% of the federal poverty level. The IHW Program is authorized by an 1115 waiver which runs through December 31, 2014.

PPIL has concerns with these sections of the Concept Paper:

- Pathway #2: Delivery System Transformation
- Pathway #3: Build Capacity of the Health Care System for Population Health Management

**Pathway #2: Delivery System Transformation**

PPIL understands that the State has a goal of moving at least 50% of those in Medicaid into coordinated care. The Concept Paper indicates that the transition to more coordinated care will help reach goals of lower costs as well as improved health outcomes. However, PPIL must point out that, when it comes to family planning services, federal law recognizes that restrictions of managed care may not be the best approach. In order to ensure that women use the most reliable contraceptive methods effectively, they must have direct access to a family planning provider that they trust. Therefore, federal allows women enrolled in Medicaid to have direct access to the family planning provider of their choice even if that provider is not in the network of the Medicaid plan in which they are enrolled. To interfere with direct access to a preferred family planning provider creates a risk that a woman will not receive services in a timely manner, will use a less effective method, or forego family planning services altogether. Any one of these would adversely impact health outcomes as well as costs. Therefore, as the State’s delivery system is transformed, systems that create barriers to direct access to patient preferred family planning providers must be eliminated.

**Pathway #3: Build Capacity of the Health Care System for Population Health Management**

Starting on January 1, 2014, we expect many of our patients enrolled in IHW or Title X to be eligible for full Medicaid coverage through Medicaid expansion. However, we also understand that many of these patients will move back and forth between eligibility for Medicaid and eligibility for subsidized insurance coverage through the Marketplace. Therefore, we appreciate that the IHW Program has been extended through 2014 to provide a safety net for family planning services. Women on IHW whose income is between 138-200% FPL would be eligible for full Medicaid if they became pregnant because the Illinois Medicaid program covers any pregnant woman whose income is at or below 200% FPL. The IHW Program was created through a waiver in order to provide women with family planning services so that they can plan for healthy and well-spaced pregnancies in order to achieve self-sufficiency for themselves and their families. IHW has proven to not only be budget neutral, but also budget saving because it has saved the Medicaid Program millions in tax dollars that would have otherwise been spent on medical services for prenatal, delivery, and infant care.

Because the issue of “churning” between Medicaid and the Marketplace will continue in the coming years and because some women will become eligible for Medicaid because of pregnancy and childbirth, we

encourage the State of Illinois to apply to extend the Illinois Healthy Women 1115 waiver through 2020. Unfortunately, the Concept Paper did not mention the IHW waiver as an option in addressing this issue.

In addition to helping address “churning”, PPIL sees the IHW Program as an important in addressing issues related to Population Health Management. The IHW Program can be important for ensuring continuity of care and providing essential preventive services for thousands of Illinois women. The services provided through IHW not only prevent unintended pregnancies, but also include well women visits, early detection of breast and cervical cancer, and testing and treatment for sexually transmitted infections. Many of these services have been recognized as essential preventive health services under the Affordable Care Act because they reflect a public health policy that focuses on wellness. Thus, the IHW waiver should be extended for an additional five years to help fulfill the Concept Paper’s goal of addressing “Wellness Strategies”.

Planned Parenthood of Illinois looks forward to continuing to work with the State as it continues on its Path to transformation. We hope that you can rely on PPIL as a resource and a partner when it comes to issues of women’s and reproductive health care. If you have any questions or need additional information, please contact: Brigid F. Leahy, Director of Government Relations, at 217-522-6776 ext. 6002 or [brigidl@ppil.org](mailto:brigidl@ppil.org).